

REED SMITH LLP
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REED SMITH LLP
Timothy P. Law, Esq. (admitted *pro hac vice*)
1717 Arch Street
Three Logan Square, Suite 3100
Philadelphia, PA 19103
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Facsimile: (215) 851-1420
E-mail: tlaw@reedsmith.com
*Special Insurance Counsel for Debtor
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
THE ROMAN CATHOLIC DIOCESE OF	:	Case No. 20-12345 (MG)
ROCKVILLE CENTRE, NEW YORK, ¹	:	
Debtor.	:	
	:	

**THIRTY-SIXTH MONTHLY STATEMENT OF REED SMITH LLP, AS
SPECIAL INSURANCE COUNSEL FOR THE DEBTOR AND DEBTOR IN POSSESSION,
OF FEES FOR PROFESSIONAL SERVICES RENDERED AND
DISBURSEMENTS INCURRED FOR THE PERIOD
SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

Name of Applicant:	Reed Smith LLP
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	Order entered on November 4, 2020, <i>nunc pro tunc</i> to October 1, 2020
Period for which compensation and reimbursement is sought:	September 1, 2023 to September 30, 2023
Amount of Compensation sought as actual, reasonable and necessary:	\$294,815.50 80% of which is \$235,852.40

¹ The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue P.O. Box 9023, Rockville Centre, NY 11571-9023.

Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$7,601.72
Fees and Expenses of Debtor's Consulting Expert ("Expert F&E")	\$59,326.50 ²
TOTAL (80% of fees, 100% of costs, 100% of Expert F&E)	\$302,780.62

Reed Smith LLP ("Reed Smith"), as Special Insurance Counsel for the Debtor and Debtor-In Possession, hereby submits this thirty-sixth monthly statement (the "Monthly Statement") for the period of September 1, 2023 through September 30, 2023 (the "Statement Period") for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court's Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 129] (the "Fee Procedures Order"). Reed Smith requests: (a) interim allowance and payment of compensation in the amount of \$235,852.40 (80% of \$294,815.50) of fees on account of reasonable and necessary professional services rendered to the Debtor by Reed Smith, (b) reimbursement of actual and necessary costs and expenses in the amount of \$7,601.72 incurred by Reed Smith during the Statement Period, and (c) reimbursement for services rendered, and costs and expenses incurred, by Debtor's consulting expert in the amount of \$59,326.50.

FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD

1. Set forth below is a list of the positions of the Reed Smith professionals and paraprofessionals who provided services to the Debtor during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Debtor during the Statement Period.

² Submitted for payment pursuant to *Order Authorizing the Retention of Experts* [Dkt. No. 783], ¶ 3.

Name	Title	Department	Office	JD Year	Rate	Hours	Amount
Law, Timothy	Equity Partner	Litigation	Philadelphia	1995	1,250	512	\$64,000.00
Law, Timothy	Equity Partner	Litigation	Philadelphia	1995	625	2.0	\$1,250.00
Javian, Aaron	Fix.Sh.Partner	Business and Finance	New York	2004	1,215	5.1	\$6,196.50
Kramer, Ann	Fix.Sh.Partner	Litigation	New York	1984	1,390	54.6	\$75,894.00
Berringer, John	Counsel	Litigation	New York	1980	1,285	57.0	\$73,245.00
Kim, Esther Y.	Associate	Litigation	Philadelphia	2018	685	56.0	\$38,360.00
LauKamg, Christopher	Paralegal	Business and Finance	New York	-	410	32.7	\$13,407.00
Simmonds, Lianna E.	Paralegal	Litigation	Philadelphia	-	330	3.9	\$1,287.00
Zygmond-Felt, Georgia A.	Paralegal	Litigation	Philadelphia	-	380	2.2	\$836.00
Schad, James	Other	Litigation	Washington	-	600	33.9	\$20,340.00
						298.6	\$294,815.50
TOTAL:						298.6	\$294,815.50

2. The rates charged by Reed Smith for services rendered to the Debtor are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients as described in the engagement letter between Reed Smith and the Debtor. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

EXPENSES INCURRED DURING THE STATEMENT PERIOD

3. Set forth below is a categorical list of expenses incurred by Reed Smith during the Statement Period in the course of representing the Debtor.

Description	Amount
USDC SDNY June 16, 2023 Hearing Transcript Expense	\$ 1,531.75
Gravity Stack LLC May 2023 Invoice	\$4,912.20
Pacer	\$2.80
Postage Expense	\$ 7.17
W. Chapin Deposition Transcript Expense	\$ 1,147.80
TOTAL:	\$ 7,601.72

NOTICE AND OBJECTION PROCEDURES

4. Reed Smith has provided notice of this statement upon the following parties by electronic or first class mail: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, NY 10004 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); and (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.).

5. Pursuant to the Fee Procedures Order, objections to this Monthly Statement, if any, must be served no later than **October 30, 2023** (the “Objection Deadline”) upon the following parties: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, NY 10004 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl

& Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.); and (v) Special Insurance Counsel, Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Aaron Javian, Esq. and John B. Berringer, Esq.) and Reed Smith LLP, 1717 Arch Street, Three Logan Square, Suite 3100, Philadelphia, PA 19103 (Attn: Timothy P. Law, Esq.).

6. If no objections to this Monthly Statement are received by the Objection Deadline, the Debtor will be authorized thereafter to pay Reed Smith 80% of the fees and 100% of the expenses identified in the Monthly Statement as well as 100% of the Expert F&E.

7. To the extent an objection to the Monthly Statement is received on or before the Objection Deadline, the Debtor will withhold payment of that portion of the Monthly Statement to which the objection is directed and is authorized to pay the remainder of fees and expenses in the percentages set forth above. To the extent such objection is not resolved, it shall be preserved and presented to the Court at the next interim or final fee application hearing to be heard in accordance with paragraph 2(k) of the Fee Procedures Order.

Dated: October 13, 2023
New York, New York

REED SMITH LLP

/s/ Aaron Javian

Aaron Javian, Esq.
John B. Berringer, Esq.
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 521-5400
Facsimile: (212) 521-5450
E-mail: ajavian@reedsmit.com
E-mail: jberringer@reedsmit.com

-and-

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Timothy P. Law, Esq. (admitted *pro hac vice*)
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*Special Insurance Counsel for Debtor and
Debtor in Possession*

EXHIBIT A



Reed Smith LLP
599 Lexington Avenue
22nd Floor
New York, NY 10022
Telephone: +1 212 851 8100
Fax: +1 212 851 1420
Tax ID # 25-0749630

ABU DHABI ♦ ATHENS ♦ AUSTIN ♦ BEIJING ♦ BRUSSELS ♦ CENTURY CITY ♦ CHICAGO ♦ DALLAS ♦ DUBAI ♦ FRANKFURT ♦ HONG KONG ♦ HOUSTON ♦ KAZAKHSTAN ♦ LONDON ♦ LOS ANGELES ♦ MIAMI
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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3660708**
Invoice Date: **10/10/2023**
Client Number: **504893**
Matter Number: **504893.20001**

REMITTANCE PAGE
PLEASE RETURN THIS COPY WITH YOUR PAYMENT

RE: Non-Working Travel

Total Current Fees.....\$ 1,250.00

Total Due This Invoice: \$ 1,250.00

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3660708**
Invoice Date: **10/10/2023**
Client Number: **504893**
Matter Number: **504893.20001**

RE: Non-Working Travel

INVOICE SUMMARY

Total Current Fees.....\$ 1,250.00

Total Due This Invoice: \$ 1,250.00

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: 3660708
Invoice Date: 10/10/2023
Client Number: 504893
Matter Number: 504893.20001

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH September 30, 2023

Date	Timekeeper	Description	Hours
09/26/23	T.P. Law	Travel to and from Philadelphia re: Committee's request for derivative standing to pursue claim against insurance companies.	2.00
Total Hours			2.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Timothy P. Law	2.00 hrs @ \$ 625.00 / hr		1,250.00
Total Professional Services			1,250.00

INVOICE SUMMARY

Total Fees	\$ 1,250.00
TOTAL CURRENT INVOICE DUE	\$ 1,250.00
Total Amount Due	\$ 1,250.00



Reed Smith LLP
Three Logan Square
Suite 3100
1717 Arch Street
Philadelphia, PA 19103
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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3660706**
Invoice Date: **10/10/2023**
Client Number: **504893**
Matter Number: **504893.60005**

REMITTANCE PAGE
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RE: Chapter 11 Insurance Recovery

Total Current Fees.....	\$ 285,132.50
Total Current Expenses and Other Charges	\$ <u>7,601.72</u>
Total Due This Invoice:	\$ <u>292,734.22</u>

Please Remit to:

Mail To:
Reed Smith LLP
P.O. Box 360110
Pittsburgh, PA 15251-6110

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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Invoice Number: **3660706**
Invoice Date: **10/10/2023**
Client Number: **504893**
Matter Number: **504893.60005**

RE: Chapter 11 Insurance Recovery

INVOICE SUMMARY

Total Current Fees.....	\$ 285,132.50
Total Current Expenses and Other Charges	\$ 7,601.72
Total Due This Invoice:	\$ <u>292,734.22</u>

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Mail To:
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Invoice Date: **10/10/2023**
Client Number: **504893**
Matter Number: **504893.60005**

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH September 30, 2023

Date	Timekeeper	Description	Hours
09/01/23	J.C. Schad	Prepare draft Exhibit A for report to E. Kim (.80); research materials received from stored records re: RFPs to insurers (1.0); review, notate, record insure letters for report to J. Berringer (1.3); prepare transmission of insurer letters to defense counsel in accordance with guidance from J. Berringer and B. Davey (2.7).	5.80
09/01/23	E. Y. Kim	Call with J. Schad regarding LMI and Arrowood policy documents from Porter & Curtis for production to LMI and Arrowood.	0.50
09/01/23	J.B. Berringer	Emails B. Davey, C. Adams, J. Schad, A. Kramer re: Arrowood and defense costs.	2.90
09/01/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/05/23	J.C. Schad	Prepare report to J. Berringer (.50); discussion with E. Kim re: materials prepared for production to Arrowood (.20).	0.70
09/05/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/05/23	J.B. Berringer	Review Placa docs. for deposition (1.6); emails C. Adams re: dep. (.40); review B. Davey email re: Arrowood denials (.30); review prior correspondence re: Arrowood denials (.40); review M. Natale email re: Placa dep. (.10).	2.80



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Date	Timekeeper	Description	Hours
09/06/23	E. Y. Kim	Analyze Arrowood's discovery responses relating to duty to cooperate and late notice (.90); email T. Law regarding same (.20); draft cover email and index for supplemental production of policy documents to Arrowood (.70); finalize supplemental production of policy documents to Arrowood (1.1).	2.90
09/06/23	A. Kramer	Work in process call with client, JD, A&M and RS teams to discuss next mediation session, 9/6 hearing, insurance strategy (1.2); review Arrowood objection to 2004 request (.20); email exchange with Law and Berringer re: same (.20); email exchange with Ball re: Committee call (.10); email exchange with RS team re: new policy documentation from Porter & Curtis (.20).	1.90
09/06/23	J.C. Schad	Prepare reports with supporting materials to E. Kim re: documents for production (2.6); attention to J. Berringer re: correspondence to insurer re: denial disputes (1.6); attention to E. Sorenson re: parish coverage letters (2.4).	6.60
09/06/23	T.P. Law	Review and comment on Arrowood's responses to the Diocese's discovery requests, beginning correspondence in response.	1.30
09/06/23	T.P. Law	Telephone conference with Allianz counsel re: Committee's motion for standing to prosecute action.	0.30
09/06/23	T.P. Law	Participate in work in process call with client and Jones Day.	1.20
09/06/23	J.B. Berringer	Team conference call (1.4); t/c A. Kramer re: status (.10); review 2004 motion by UCC, Arrowood opposition (.80); review C. Ball email re: Arrowood (.20); review Arrowood discovery responses (.50); review emails re: new Arrowood docs, emails Schad re: same (.60); email re: amended charts, discovery responses (.30); reply to Kramer email re: KCIC (.30).	4.20
09/06/23	C.M. LauKamg	Arrange USBC SDNY J. Berringer September 12, 2023 Hearing Appearance and circulate	0.40



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Date	Timekeeper	Description	Hours
		confirmation of same.	
09/06/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/07/23	A. Kramer	Teams call with mediators and parishes (1.5); conference call re: derivative standing motion with T. Law and A. Javian (.50); teams pre-call with JD re: committee call (.50); Zoom call with committee re: settlement (1.0); email exchanges with Sorenson and RS Team re: new Arrowood policy documentation (.20); email exchange with JD and KCIC re: data for Global (.30).	4.00
09/07/23	A. Javian	Preparation for and attend telephone conference with T. Law, A Kramer re: response to Committee's derivative standing motion.	1.00
09/07/23	C.M. LauKamg	Draft template Objection to the Official Committee of Unsecured Creditors' Motion for an Order Granting Leave, Standing, and Authority to Prosecute a Cause of Action on Behalf of the Debtor and Its Estate in preparation for electronic filing.	1.60
09/07/23	J.C. Schad	Research, comparative analysis re: evidence of coverage, prepare report to J. Berringer, A. Kramer, T. Law re: evidence of coverage (2.2); research insurer letters re: bases of denials for report to E. Sorenson, J. Berringer, A. Kramer, T. Law (1.2).	3.40
09/07/23	T.P. Law	Draft opposition to Unsecured Creditors Committee motion for derivative standing.	3.30
09/07/23	T.P. Law	Telephone conference with Aaron Javian and Ann Kramer re: Unsecured Creditors Committee motion for derivative standing.	0.60
09/08/23	C.M. LauKamg	Arrange USBC SDNY September 12, 2023 and September 26, 2023 Hearing Appearances and circulate confirmations of same.	0.80
09/08/23	C.M. LauKamg	Revise Objection to the Official Committee of	1.80



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Date	Timekeeper	Description	Hours
		Unsecured Creditors' Motion for an Order Granting Leave, Standing, and Authority to Prosecute a Cause of Action on Behalf of the Debtor and Its Estate in preparation for electronic filing.	
09/08/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/08/23	A. Kramer	Review/revise draft response to Committee standing motion (.50); conference call with Stephens and KCIC valuation team re: analysis (.60); email exchange with mediators (.20); email exchanges with JD and KCIC re: data for Global (.20).	1.50
09/08/23	J.B. Berringer	Review of Opposition to UCC motion and email T. Law re: same (.60); review of emails re: Placa deposition and email C. Adams re: same (.50).	1.10
09/08/23	T.P. Law	Draft opposition to Unsecured Creditors Committee motion for derivative standing.	5.60
09/11/23	T.P. Law	Emails to [REDACTED].	0.20
09/11/23	T.P. Law	Draft revisions to LMI and Evanston interrogatory responses.	1.30
09/11/23	T.P. Law	Draft response to Unsecured Creditor Committee motion for standing to pursue a claim against LMI and Evanston and circulate to Jones Day for review and comment.	1.80
09/11/23	C.M. LauKamg	Arrange USDC SDNY September 18, 2023, September 19, 2023 and September 21, 2023 Hearing Appearances and circulate confirmations of same.	0.60
09/11/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/11/23	E. Y. Kim	Revise responses to LMI's and Evanston's	1.50



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Date	Timekeeper	Description	Hours
		interrogatories per additional revisions from T. Law (1.1); emails with client regarding review of same (.40).	
09/11/23	J.B. Berringer	Review emails re: scheduling.	0.40
09/12/23	T.P. Law	Telephone conference with Reed Smith and Jones Day teams re: Committee filing supporting requests for relief from automatic stay.	0.60
09/12/23	T.P. Law	Telephone conference with J. Berringer and A. Kramer re: Committee filing supporting requests for relief from automatic stay.	0.30
09/12/23	C.M. LauKamg	Prepare USDC SDNY September 18, 2023, September 19, 2023 and September 21, 2023 Electronic Device Access Form and submit same to Chambers.	0.40
09/12/23	A. Kramer	Review Committee lift stay motion papers (1.2); email exchange and pre-call re: same with Berringer and Law (.30); teams call with JD and RS teams re: response to Committee motion to lift stay (.90).	2.40
09/12/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/12/23	J.B. Berringer	Review Artese letter to Arrowood, email Artese re: same (.50); t/c team re: UCC, Survivors motion (.90); emails T. Law, A. Kramer re: NY law re: same (.40); emails re: T. Burns decl., UCC motion (.50); review Arrowood deficiency letter (.40); t/c E. Kim re: Interrogatory responses (.20); review letter to UCC (.60); review draft Opposition to UCC motion re: derivative standing (.50).	4.00
09/13/23	A. Kramer	WIP call with Renker, JD, A&M and RS teams re: mediation, committee motions etc. (.50); teams call re: lift stay motion strategy with JD team (.90).	1.40
09/13/23	E. Y. Kim	Revise, finalize discovery responses to LMI and Evanston (1.5); finalize document production to	2.80



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Date	Timekeeper	Description	Hours
		same (1.3).	
09/13/23	C.M. LauKamg	Telephone to USDC SDNY Judge Cave's Chambers regarding A. Kramer and J. Berringer Electronic Access Form for the September 18, 2023, September 19, 2023 and September 21, 2023 Settlement Conferences and confirm receipt of same.	0.20
09/13/23	J.B. Berringer	Review E. Stephens letter to Mediators (.60); prep for team call (.40); team call (.60); review emails re: Allianz meeting (.40); review T. Law letter to Arrowood re: discovery (.30); review E. Kim emails re: Interrogatory responses (.40).	2.70
09/13/23	G. A. Zygmund-Felt	Reformat PDFs for discovery responses and send back to E. Kim.	0.20
09/13/23	T.P. Law	Draft letter to Arrowood's counsel identifying deficiencies in Arrowood's responses to our targeted discovery requests on late notice and cooperation defenses.	3.30
09/13/23	T.P. Law	Email Arrowood's counsel M. Natale to arrange meet and confer re: Arrowood's complaints about Diocese discovery responses.	0.20
09/14/23	T.P. Law	Draft email to Bill Chapin to respond to Arrowood questions.	0.70
09/14/23	A. Kramer	Review/revise objection to standing motion (.50); email exchanges between JD and RS teams re: same (.40).	0.90
09/14/23	E. Y. Kim	Attend, meet and confer with Arrowood's counsel regarding discovery disputes (.80); analyze Arrowood correspondence and Diocese production regarding deficiencies and draft notes to prepare for meet and confer (3.9); draft response letter to Arrowood deficiency letter (1.1).	5.80
09/14/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80



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Date	Timekeeper	Description	Hours
09/14/23	J.B. Berringer	Review email from A. Kramer (.30); review discovery responses (1.2).	1.50
09/14/23	T.P. Law	Draft additional revisions to objection to Committee's motion for derivative standing to pursue claims against Allianz and LMI and circulate to Jones Day.	0.80
09/14/23	T.P. Law	Participate in meet and confer with Arrowood's counsel re: discovery responses.	0.80
09/14/23	T.P. Law	Prepare for meet and confer with Arrowood's counsel re: discovery responses.	0.90
09/15/23	J.B. Berringer	Review draft opposition to UCC motion, email comments from team (.90); t/c A. Kramer, T. Law re UCC call (.50); emails C. Adams re: Placa dep (.40); emails E. Kim re: LMI production (.20); review final edits to Opp. Brief (.50).	2.50
09/15/23	A. Kramer	Teams call with insurers and JD team re: committee motions and mediation (.80); teams call with committee and JD team re: committee motions (.70); Conference call with Berringer and Law re: calls with committee and insurers (.30); email exchange with JD and RS teams re: committee call (.20).	2.00
09/15/23	T.P. Law	Telephone conference with [REDACTED].	0.30
09/15/23	T.P. Law	Revise responses to Evanston interrogatories.	0.60
09/15/23	T.P. Law	Telephone conference with A. Kramer re: requests from [REDACTED].	0.20
09/15/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
09/15/23	T.P. Law	Email exchange re: Bill Chapin assistance with Arrowood questions about completeness of discovery responses.	0.30
09/15/23	T.P. Law	Draft additional revisions to objections to Committee's derivative standing motion and send to Jones Day.	0.80



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Date	Timekeeper	Description	Hours
09/18/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/18/23	J.B. Berringer	Review emails re: Objection to UCC motion, discovery in Adv. Proceedings.	1.10
09/18/23	C.M. LauKamg	Finalize USBC SDNY Objection to Committee Standing Motion in preparation for electronic filing.	1.00
09/18/23	A. Kramer	Attend Mediation.	8.60
09/18/23	E. Y. Kim	Draft letter regarding Arrowood's objections to 30(b)(6) deposition notice.	2.40
09/18/23	T.P. Law	Revise and finalize objection to Committee derivative standing motion.	1.90
09/18/23	T.P. Law	Email exchanges with Ann Kramer and [REDACTED] re: [REDACTED].	0.40
09/18/23	A. Javian	Review response to UCC's derivative standing motion.	0.50
09/19/23	J.C. Schad	Prepare materials for transmission to C. Adams pursuant to discussion with J. Berringer (.50); attention to analysis of evidence (.40); prepare report re: evidence of coverage in triggered years (3.5).	4.40
09/19/23	C.M. LauKamg	Finalize, electronically file and serve USBC SDNY Objection to Committee Standing Motion and update master files and calendar.	0.80
09/19/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/19/23	J.B. Berringer	Review Placa docs for t/c with C. Adams (.70); t/c C. Adams (.60); t/c J. Schad re: Arrowood Certs.; (.20); review Arrowood Joinder in Objection to UCC derivative motion (.60); review LMI Objection, email T. Law, A. Kramer re: same (1.60); review emails re: [REDACTED] (.50);	4.80



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Date	Timekeeper	Description	Hours
		review J. Schad email re: Arrowood Certs, duty to defend (.60).	
09/19/23	A. Kramer	Attend Mediation.	8.00
09/19/23	E. Y. Kim	Analyze Gallagher Bassett Agreements and materials for supplemental production to LMI and Evanston (2.3); email J. Matthews regarding production of same (.10).	2.40
09/19/23	T.P. Law	Communications with Georgia Zygmund-Felt, Jones Day, and Reed Smith teams re: chart of information for [REDACTED].	1.80
09/20/23	T.P. Law	Work with paralegal L. Simmonds to provide publicly available information about claim valuation and severity levels to [REDACTED].	2.20
09/20/23	T.P. Law	Telephone conference with Jones Day about information requested by [REDACTED].	0.40
09/20/23	T.P. Law	Participate in work in process call with client, Jones Day, and Reed Smith teams.	0.50
09/20/23	T.P. Law	Review and suggest response to Burns Bair requests to file motions in the insurance adversary proceedings.	0.70
09/20/23	T.P. Law	Draft and circulate email response to Jesse Bair inquiry re: derivative standing.	0.40
09/20/23	T.P. Law	Telephone conference with A. Kramer and J. Berringer re: committee demands.	0.30
09/20/23	A. Kramer	Work in Process call with T. Renker, JD, A&M and RS teams re: mediation, Committee motions (.50); conference call with [REDACTED] (.50); review messages and enclosures from J. Bair on behalf of Committee re: insurance (.30); email exchanges with JD and RS Teams re: proposed SJ motions (.40); revise message to J. Bair re: standing motion (.20); conference call with Law and Berringer re: messages from BurnsBair (.60).	2.50
09/20/23	E. Y. Kim	Analyze Gallagher Bassett documents for supplemental production to LMI and Evanston and finalize same (4.2); analyze documents from	5.30



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Date	Timekeeper	Description	Hours
		client and Network Adjusters for second supplemental production to LMI and Evanston (1.1).	
09/20/23	J.B. Berringer	Prep. for, attendance on team call (.60); review emails re: UCC motion (.70); review of UCC draft motions for Summary Judgment on consent to settle issue (.90); review emails from team re: same (.80); email re: same (.20); review of draft letter to UCC (.30); t/c T. Law, A. Kramer re: draft letter, draft UCC motions (.90); emails with J. Schad re: Arrowood duty to defend (.80).	5.20
09/20/23	J.C. Schad	Prepare reports with supporting materials re: denied claims for report to J. Berringer (3.6); Prepare report to J. Berringer re: triggered policies with evidence of coverage for claims denied by counsel for Arrowood (2.3).	5.90
09/21/23	J.C. Schad	Correlative analysis re: bases of denials, remanded cases for report to E. Sorensen.	1.30
09/21/23	T.P. Law	Emails with Reed Smith team re: deposition scheduling and attendance.	0.30
09/21/23	J.B. Berringer	Emails with T. Law, A. Kramer re: Arrowood depositions (.50); emails with J. Schad re: Arrowood duty to defend (.40); review E. Kim email re: 30 (b)(6) deps. (.30); arrangements and prep for Oral Argument on UCC motions (2.5); review E. Kim emails re: discovery responses (.30); review emails to E. Sorenson re: Arrowood duty to defend (.40).	4.40
09/21/23	A. Kramer	Attend Mediation.	3.70
09/21/23	E. Y. Kim	Analyze documents from client and Network Adjusters for second supplemental production to LMI and Evanston (2.5); analyze materials relating to first notice documents in Arrowood production for discovery project (.40).	2.90
09/21/23	C.M. LauKamg	Prepare USDC SDNY September 27, 2023 and September 28, 2023 Electronic Device Access Form and submit same to Chambers.	0.40



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Date	Timekeeper	Description	Hours
09/21/23	C.M. LauKamg	Arrange USBC SDNY September 26, 2023 hearing appearances and circulate confirmations of same.	0.40
09/21/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/22/23	C.M. LauKamg	Arrange USBC SDNY September 26, 2023 Hearing Appearances and circulate confirmations of same.	0.60
09/22/23	T.P. Law	Review Committee Reply Brief re: derivative standing motion.	0.30
09/22/23	T.P. Law	Solicit comments from Jones Day on proposed response to insurance counsel for the Committee.	0.30
09/22/23	T.P. Law	Telephone conference with Reed Smith and Jones Day teams to prepare for oral argument on Committee's derivative standing motion.	0.70
09/22/23	J.B. Berringer	Prep. for and attendance on call re: prep. for oral argument on UCC motion (.70); review E. Kim draft letter to Arrowood (.30); t/c C. Adams re: Placa dep. (.60); review draft revised Law letter to UCC re: settlements with insurers (.30); review UCC Reply on motion for derivative standing (.80).	2.70
09/22/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/22/23	E. Y. Kim	Analyze Network Adjusters agreements and Bishop program materials for production to LMI.	3.80
09/25/23	G. A. Zygmund-Felt	Meeting with E. Kim re: Discovery task and dates of Notice letters.	0.30
09/25/23	G. A. Zygmund-Felt	Review materials for discovery project from E. Kim.	0.70
09/25/23	T.P. Law	Address requests for information from potential litigation funder.	0.90



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Date	Timekeeper	Description	Hours
09/25/23	L. E. Simmonds	Begin to analyze all case law cited in original Mediation Memorandum to see if any additional authorities need to be supplemented.	3.00
09/25/23	T.P. Law	Prepare for oral argument in New York re: Committee request for derivative standing to pursue deceptive practices.	4.70
09/25/23	A. Kramer	Review mediators report (.10); email exchange with RS team re: same (.10).	0.20
09/25/23	J.C. Schad	Prepare, participate on call with E. Kim re: supplemental production of policy-related materials to insurers (.60); report to T. Law re: policy materials (.20); research documents produced to Arrowood (.70); research documents for supplemental production to insurers (.80).	2.30
09/25/23	J.B. Berringer	Review E. Kim , J. Moffitt emails re: discovery schedule in LMI Proceeding (.40); review E. Kim emails re: outstanding discovery demands (.30); review M. Natale email re: Placa deposition (.20); arrangements for Placa deposition (.40); review Adams email, email to E. Kim re: Placa materials (.40); review Mediators' Report, Kramer email re: same (.40); review Court filings re: mediation, hearing on UCC motion (.30); review team emails re: UCC motion (.40).	2.80
09/25/23	C.M. LauKamg	Follow up with USDC SDNY Judge Cave's Chambers regarding A. Kramer and J. Berringer Electronic Access Order for the September 27, 2023 and the September 28, 2023 Settlement Conferences and circulate same to Attorneys.	0.20
09/25/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/25/23	E. Y. Kim	Analyze Network Adjusters agreements and Bishop program materials for production to LMI (2.5); confer with G. Zygmund-Felt regarding analysis of notice documents (.50); call with J. Schad regarding policy documents to be	3.50



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Date	Timekeeper	Description	Hours
		produced to Evanston (.50).	
09/26/23	J.C. Schad	Research, extract, prepare, deliver policy copies, policy-related materials, discovery requests and responses (1.2); review, notate materials re: supplemental productions to other parties per E. Kim (.60).	1.80
09/26/23	J.B. Berringer	Review of briefing re: UCC motion (2.1); attendance at hearing, mtg with UCC counsel re: Rule 2004 discovery (1.8); review Hearing Summary (.50); review notice, Adams email re: Placa dep. (.30).	4.70
09/26/23	T.P. Law	Participate in motion hearing regarding Committee request for derivative standing to pursue claim against LMI and Allianz re: deceptive practices.	2.20
09/26/23	T.P. Law	Prepare for motion hearing regarding Committee request for derivative standing to pursue claim against LMI and Allianz re: deceptive practices.	3.70
09/26/23	A. Kramer	Review revised Camden plan and TDP (2.7); attend hearing on UCC standing motion (1.5); meeting with LMI, Allianz, JD and RS teams re: settlement/mediation (1.0).	5.20
09/26/23	E. Y. Kim	Analyze Network Adjusters Agreements and Bishop program materials for production to LMI.	1.60
09/26/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
09/26/23	L. E. Simmonds	Complete analysis of all case law cited in original Mediation Memorandum to see if any additional authorities need to be supplemented.	0.90
09/26/23	E. Y. Kim	Draft response letter to Arrowood's September 12 deficiency letter and analyze documents regarding same.	2.90
09/27/23	T.P. Law	Draft revisions to discovery letter to Arrowood.	0.60
09/27/23	G. A. Zygmund-	Correspond with Veritext re: transcripts for E.	0.20



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Date	Timekeeper	Description	Hours
	Felt	Kim.	
09/27/23	T.P. Law	Review Bankruptcy Court Order re: Rule 2004 discovery from Arrowood.	0.40
09/27/23	J.B. Berringer	Review Judge Glenn's Rule 2004 Order (.80); review draft letter to Arrowood re: 30(b)(6), revisions to same (1.50); review new docs to be produced to Arrowood , emails C. Adams re: same (.90); review new discovery responses (.60); review emails re: Rule 2004 meet and confer (.80).	4.60
09/27/23	J.C. Schad	Pursuant to discussion with E. Kim research, collect, prepare policy copies, policy-related materials for supplemental productions.	1.70
09/27/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.20
09/27/23	T.P. Law	Review and comment on letter to Arrowood re: 30(b)(6) objections.	0.30
09/27/23	T.P. Law	Email update re: mediation progress with LMI and Allianz.	0.20
09/27/23	T.P. Law	Draft email to Committee insurance counsel re: potential motions for partial summary judgment in insurance actions.	0.40
09/27/23	E. Y. Kim	Revise and finalize response letter to Arrowood's September 13 deficiency letter (4.8); analyze master case tracking and notice documents for supplemental production to Arrowood (2.4); draft redaction log for supplemental production (.40); draft revised redaction log for February 2, 2023 production (.50).	8.10
09/27/23	T.P. Law	Emails to Committee insurance counsel re: Arrowood financial condition.	0.90
09/27/23	T.P. Law	Meet with E. Kim re: Arrowood correspondence.	0.30
09/27/23	A. Kramer	Attend mediation (7.5); email exchanges with T. Law and J. Berringer re: mediation, committee	7.90



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Date	Timekeeper	Description	Hours
		demands, 2004 opinion etc. (.40).	
09/28/23	E. Y. Kim	Draft task list regarding Arrowood, Evanston and LMI adversary proceedings (1.4); analyze documents in LMI production for deficiencies (1.8); analyze LMI discovery responses regarding same (1.2); revise response letter to Arrowood 30(b)(6) objections (2.1).	6.50
09/28/23	G. A. Zygmund-Felt	Review correspondence from T. Law and review task-tracking list.	0.80
09/28/23	J.B. Berringer	T/c C. Adams, J. Nador re: Placa deposition (.70); review task outline, email T. Law re: policy discovery (.60); review Artese email re: Arrowood, email A. Kramer re: same (.40); review T. Burns email re: Rule 2004 Arrowood discovery (.40).	2.10
09/28/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
09/28/23	T.P. Law	Address status and strategy with E. Kim and G. Felt.	0.30
09/28/23	A. Kramer	Email exchange with Burns, Bair and Law re: 2004 hearing, etc. (.30); listen to lift stay hearing in Syracuse Diocese case (1.7); communications with JD Team re: 2004 hearing and Syracuse lift stay hearing (.40); email exchange with Roten and Sugayan re: Syracuse hearing (.10).	2.50
09/29/23	J.B. Berringer	Review material re: Ecclesia, t/c W. Chapin re: same (1.0); review material re: Ecclesia from K. Porter (.80) review emails from client (.70).	2.50
09/29/23	T.P. Law	Telephone conference with Committee insurance counsel re: insurance strategy.	0.70
09/29/23	A. Kramer	Zoom call with Burns, Bair and Law re: insurance strategy (.80); email exchange with C. Ball and B. Rosenthal re: allocation/valuation (.40); research/respond to email exchange with Ball and Rosenblum re: valuation/allocation issues	1.90



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Date	Timekeeper	Description	Hours
		(.70).	
09/30/23	E. Y. Kim	Analyze documents in Evanston's production for deficiencies (2.5); analyze Evanston's discovery responses regarding same (.60).	3.10
Total Hours			283.10

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	54.60 hrs @ \$ 1,390.00 / hr	1,390.00 / hr	75,894.00
John B. Berringer	57.00 hrs @ \$ 1,285.00 / hr	1,285.00 / hr	73,245.00
Timothy P. Law	51.20 hrs @ \$ 1,250.00 / hr	1,250.00 / hr	64,000.00
Aaron Javian	1.50 hrs @ \$ 1,215.00 / hr	1,215.00 / hr	1,822.50
Esther Y. Kim	56.00 hrs @ \$ 685.00 / hr	685.00 / hr	38,360.00
James C. Schad	33.90 hrs @ \$ 600.00 / hr	600.00 / hr	20,340.00
Christopher LauKamg	22.80 hrs @ \$ 410.00 / hr	410.00 / hr	9,348.00
Georgia A. Zygmund-Felt	2.20 hrs @ \$ 380.00 / hr	380.00 / hr	836.00
Lianna E. Simmonds	3.90 hrs @ \$ 330.00 / hr	330.00 / hr	1,287.00
Total Professional Services			285,132.50

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
	Pacer	2.80
	Postage Expense	7.17
05/26/2023	USDC SDNY June 16, 2023 Hearing Transcript Expense	1,531.75
09/18/2023	W. Chapin Deposition Transcript Expense	1,147.80
09/27/2023	Gravity Stack LLC Invoice May 2023	4,912.20
Total Expenses and Other Charges		7,601.72



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INVOICE SUMMARY

Total Fees	\$ 285,132.50
Total Expenses and Other Charges	\$ <u>7,601.72</u>
TOTAL CURRENT INVOICE DUE	\$ <u>292,734.22</u>
Total Amount Due	\$ <u>292,734.22</u>



Reed Smith LLP
599 Lexington Avenue
22nd Floor
New York, NY 10022
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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3660710**
Invoice Date: **10/10/2023**
Client Number: **504893**
Matter Number: **504893.60006**

REMITTANCE PAGE
PLEASE RETURN THIS COPY WITH YOUR PAYMENT

RE: Fee statements/fee applications

Total Current Fees.....\$ 8,433.00

Total Due This Invoice: \$ 8,433.00

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



Reed Smith LLP
599 Lexington Avenue
22nd Floor
New York, NY 10022
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RE: Fee statements/fee applications

INVOICE SUMMARY

Total Current Fees.....\$ 8,433.00

Total Due This Invoice: \$ 8,433.00

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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US - UNITED STATES

Invoice Number: **3660710**
Invoice Date: **10/10/2023**
Client Number: **504893**
Matter Number: **504893.60006**

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH September 30, 2023

Date	Timekeeper	Description	Hours
09/05/23	A. Javian	Review/comment on proposed order approving interim fees and expenses.	0.30
09/05/23	C.M. LauKamg	Finalize, electronically file and serve USBC SDNY Certificate of No Objection for the July 2023 Reed Smith LLP Monthly Fee Statement and update master files and calendar.	0.80
09/05/23	C.M. LauKamg	Finalize USBC SDNY Certificate of No Objection for Reed Smith LLP Thirty-Fourth Monthly Fee Statement in preparation for electronic filing.	0.20
09/06/23	A. Javian	Prepare for and attend fee app. hearing (1.5); draft summary re: same (.50).	2.00
09/07/23	C.M. LauKamg	Finalize USBC SDNY Reed Smith LLP Thirty-Fifth Monthly Fee Statement in preparation for electronic filing.	1.00
09/08/23	C.M. LauKamg	Revise USBC SDNY Reed Smith LLP Thirty-Fifth Monthly Fee Statement in preparation for electronic filing.	1.00
09/08/23	A. Javian	Discussions with A. Butler and correspondence with Chambers re: RS expenses.	0.30
09/11/23	C.M. LauKamg	Coordinate with Accounting Department regarding KCIC July 2023 Fee Payment and arrange payment of same.	0.40
09/12/23	C.M. LauKamg	Revise USBC SDNY Reed Smith LLP Thirty-Fifth Monthly Fee Statement in preparation for electronic filing.	0.60
09/13/23	C.M. LauKamg	Follow up with Accounting Department Regarding	0.50



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Date	Timekeeper	Description	Hours
		KCIC July 2023 Fee Payment and arrange same.	
09/14/23	C.M. LauKamg	Revise USBC SDNY Reed Smith LLP Thirty-Fifth Monthly Fee Statement in preparation for electronic filing.	0.80
09/15/23	C.M. LauKamg	Coordinate with Accounting Department Regarding KCIC July 2023 Fee Payment and arrange payment of same.	1.40
09/18/23	A. Javian	Review/comment on monthly invoice.	0.50
09/20/23	C.M. LauKamg	Revise and finalize USBC SDNY Reed Smith LLP Thirty-Fifth Monthly Fee Statement in preparation for electronic filing.	0.80
09/20/23	C.M. LauKamg	Follow up with Attorneys regarding KCIC August 2023 Invoices.	0.20
09/21/23	C.M. LauKamg	Finalize USBC SDNY Reed Smith LLP Thirty-Fifth Monthly Fee Statement in preparation for electronic filing.	0.40
09/21/23	C.M. LauKamg	Finalize, electronically file and serve USBC SDNY Reed Smith LLP Thirty Fifth Monthly Fee Statement and update master files and calendar.	1.80
09/21/23	A. Javian	Attention to invoicing matters.	0.50
Total Hours			13.50

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Aaron Javian	3.60 hrs @ \$ 1,215.00 / hr		4,374.00
Christopher LauKamg	9.90 hrs @ \$ 410.00 / hr		4,059.00
Total Professional Services			8,433.00

INVOICE SUMMARY

Total Fees	\$ <u>8,433.00</u>
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TOTAL CURRENT INVOICE DUE \$ 8,433.00

Total Amount Due \$ 8,433.00
